

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MICHAEL HARRELL et al.,

14-CV-7246 (VEC)

Plaintiffs,
-against-

CITY OF NEW YORK et al.,

Defendants.

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**DECLARATION OF JOHN R. CUTI, ESQ.
IN SUPPORT OF MOTION FOR INTERIM ATTORNEYS' FEES**

JOHN R. CUTI, ESQ., hereby declares under penalty of perjury, pursuant to 28 U.S.C. 1746, that the following is true and correct:

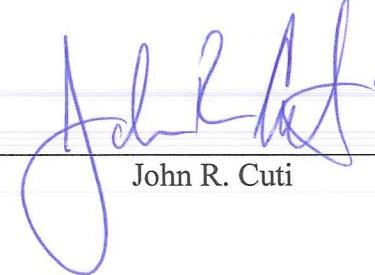
1. I am an attorney duly licensed to practice law in New York State and before this Court. I am a partner at Cuti Hecker Wang LLP. Our firm represented the Plaintiffs in this action prior to its filing, contributing substantially to (i) legal and factual research, (ii) analyzing the extensive legislative history, (iii) developing and framing the legal claims, and (iv) drafting the complaint. I submit this Declaration in connection with Plaintiffs' motion for an award of interim attorneys' fees.

2. I have carefully reviewed the Declaration of Eric Hecker dated September 30, 2016, and everything therein is true and accurate to the best of my knowledge.

3. I have carefully reviewed Exhibit A to Mr. Hecker's Declaration, which truly and accurately reflects my contemporaneously kept time records in this case.

4. I affirm under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: September 30, 2016
New York, New York



John R. Cuti